

Chameleon's April 21, 1995 stated basis for the STA -- "loss of its currently licensed site" -- is not supported by the facts in the record. Our policy is to require that the site "loss" be beyond the applicant's control before granting STA.<sup>8</sup> Based upon material submitted in the Response Letter, Chameleon appears to have voluntarily abandoned its licensed site, and its licensed Bay City, Texas, broadcast service, in order to fulfill identified contractual obligations. In the Response Letter, Chameleon discusses in great detail a Houston licensee's decision to terminate a programming agreement made between the licensee's predecessor and a Chameleon-affiliated programming supplier.<sup>9</sup> Under this agreement, Chameleon had supplied programming produced by various international broadcasters to that licensee's Houston station. Upon receiving a notice of the agreement's termination from the licensee, Chameleon "moved with all haste toward finding an acceptable transmitter site in southwest Houston to which it could move." Response Letter at 9. The "need" for an acceptable Houston broadcast signal thus appears to have formed the basis for Chameleon's STA request rather than a "loss" of site that was beyond Chameleon's control.<sup>10</sup> Chameleon's contractual obligations to programmers seeking a Houston broadcast service do not provide a basis for granting STA that deprives Bay City, Texas, of a licensed service that it has enjoyed for more than forty years.

We find that Chameleon's use of STA to introduce a new broadcast service to Houston, Texas is both a violation of our STA policies and the licensing procedures of the Communications Act of 1934, as amended (the "Act"). Section 309 of the Act provides that the Commission may not grant an application for facility modifications of the type represented by Chameleon's STA until the Commission staff has examined the subject application, provided a public notice of the acceptance of the application for filing and allowed a thirty-

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<sup>8</sup> Section 73.1635(a) of the Commission's Rules provides for the issuance of an "STA to a licensee to permit the operation of a broadcast facility for a limited period at a specific variance from the terms of the station authorization or requirements of the FCC rules applicable to the particular class of station." 47 C.F.R. §1635(a). Any STA request must "fully describe the proposed operation and the necessity for the requested STA." 47 C.F.R. § 73.1635(a)(2).

<sup>9</sup> According to the Response Letter, Chameleon's principal was also the principal of the subject programming supplier.

<sup>10</sup> Whitehead contends that Chameleon's abandonment of the Bay City Site may have been voluntary. In documents associated with the above-referenced assignment of license from Landrum, we note that Chameleon assigned the rights of some portion of the Bay City Site back to Landrum. The Response Letter fails to address our question regarding what legal rights Chameleon has with respect to the Bay City Site, in view of that assignment of lease rights. Chameleon has also not responded to our query regarding the condition of the licensed Bay City Site's transmission facilities. We note, however, that the Commission's records indicate that Landrum was operating KFCC(AM) from that site at the time of the assignment of license to Chameleon.

day period for comment on the application by relevant parties. 47 U.S.C. § 309. To the extent that Chameleon's admitted "creative use" of the STA is an attempt to foreshorten the statutory procedures mandated by the Act, we decline to permit circumvention of those requirements by use of STA.<sup>11</sup>

We further note that it is not our policy to authorize new construction intended to be for permanent operations pursuant to STA. The Commission staff rejected Chameleon's April 21, 1995 STA request because it proposed constructing a new permanent tower. Chameleon's amended May 2, 1995 exhibit had removed the term "new" and instead indicated that the tower to be used was an "existing" structure. We note, however, that the Response Letter provides conflicting dates as to when the tower was actually erected on the Harris County Site.<sup>12</sup> The Response Letter does state, though, that its "agreement" with the tower contractor to erect a tower on the Harris County Site was confirmed in a telephone conversation on April 26, 1995. Response Letter at 10. Therefore, we conclude that the tower was constructed sometime between April 26 and May 8, the date that Chameleon reports it began operations from the Harris County Site. Response Letter at 12. Because it appears that this tower was erected for the primary purpose of providing service under the STA, and with the intention of it becoming a permanent structure for operations (see May 2, 1995 letter from Chameleon), we find that extending the STA under such conditions would clearly violate our established STA policy.

We wish to address two remaining matters regarding the Response Letter. First, Chameleon states that "after very careful consideration that Mr. Werlinger made the decision to disregard [the Recession Letter]." Response Letter at 15. We caution Chameleon, and note herein, that pursuant to Section 503(b) of the Act unauthorized operation of a broadcast station can subject a licensee to forfeiture. Second, we note that Chameleon failed to address several specific questions in the Inquiry Letter. We remind Chameleon that it is a violation of Commission Rules to make a "willful material omission bearing on any matter within the jurisdiction of the Commission." 47 C.F.R. § 1.17. In any event, for the purposes of our determination as to whether the STA should be extended, we need not require additional information from Chameleon concerning aspects of that STA operation. However, with respect to our specific question concerning the specific present location of the KFCC(AM) main studio, we note that absent limited exceptions, a licensee may not remove a station's

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<sup>11</sup> We note that Chameleon's subsequent filing of an FCC Form 301 application seeking a construction permit to build permanent facilities at the Harris County Site and to change KFCC(AM)'s community of license to Missouri City, Texas does not provide an independent basis supporting extension of the subject STA.

<sup>12</sup> At one point Chameleon states that "[b]y Monday, May 1, 1995 the Rohn model 25 tower was in place." Response Letter at 10. Subsequently, Chameleon states that "working nonstop, the Chameleon crew had the tower in the air by 8:30 pm, Saturday May 6." Response Letter at 24.

main studio outside of the station's principal community contour without first securing the appropriate authorization. See 47 C.F.R. § 1125(b). Second, if a main studio is relocated pursuant to Sections 1125(b)(3)(i), (ii), proper notification must be made to the Commission. See 47 C.F.R. § 1125(b)(3)(iii). If Chameleon has relocated the KFCC(AM) main studio under either circumstance noted above, Chameleon must promptly file the required information in conformance with 47 C.F.R. § 11.25(b)(3)(iii).

**Conclusion.** The objection filed by Tom S. Whitehead IS GRANTED to the extent indicated herein. The objection filed by South Texas Broadcasting, Inc. IS DISMISSED. The August 4, 1995 request for extension of STA filed by Chameleon Radio Corporation IS DENIED. Pursuant to 47 C.F.R. § 73.1635(a)(5)(b),<sup>13</sup> the May 5, 1995 STA -- as modified by the Commission's letter of May 12, 1995 -- IS CANCELLED. KFCC(AM) must immediately cease operation from the Harris County Site. Further operation from the Harris County Site will subject Chameleon to daily forfeitures calculated in accordance with Section 503(b) of the Act. Station KFCC(AM) must resume operations from its licensed site in Bay City, Texas.<sup>14</sup>

Sincerely,

  
Larry D. Eads, Chief  
Audio Services Division  
Mass Media Bureau

cc: James P. Riley, Esquire  
Counsel for South Texas Broadcasting, Inc.  
John Joseph McVeigh, Esquire  
Counsel for Tom S. Whitehead  
CIB Houston

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<sup>13</sup> Pursuant to 47 C.F.R. § 73.1635(a)(5)(b), the Commission may modify or cancel without prior notice or hearing any STA.

<sup>14</sup> We also remind Chameleon that 47 C.F.R. § 73.1740(a)(4) provides that licensees must seek authority from the Commission to remain silent within ten (10) days of the discontinuance of operations. Such authorizations pertain only to an applicant's licensed site. Requests for silent authority pursuant to this Rule must be supported by a showing that factors beyond the licensee's control prevent the continuance of on-air service.



KFCC

1270 AM

Chameleon Radio Corporation  
(713) 575-1270 Fax: (713) 564-8653

10865 Rockley Road Houston, TX 77099 P.O. Box 1235 Stafford, TX 77497

Houston's Unique Talk and International Language Station

September 22, 1995

Roy Stewart, Chief  
Mass Media Bureau  
Federal Communications Commission  
1919 M St., N.W.  
Washington, D.C. 20554

Re: FCC letter of September 8, 1995 (1800B3-KDY)

Mr. Stewart:

This letter is tendered in response to a letter dated September 8, 1995 from the office of Larry Eads, Chief, Audio Services Division. However, in light of Mr. Eads' resignation effective October 1, 1995, this letter is being directed to your office.

Chameleon Radio Corporation ("Chameleon"), licensee of KFCC (AM) Bay City, Texas, respectfully requests the Commission's forbearance and reconsideration of its September 8, 1995 decision to cancel Chameleon's special Temporary Authority to broadcast from the Harris County site.

Section 309(f) of the Communications Act states "extraordinary circumstances requiring temporary operations in the public interest..." are allowed. The action taken by Commission staff in canceling Chameleon's STA completely ignores the extraordinary circumstances faced by Chameleon and detailed in its previous communications on the matter. Quite literally, Chameleon was faced with only two options, cease to exist thereby depriving the nearly three dozen international language communities served by KFCC of their only broadcast outlet, or find another venue from which to continue broadcasting.

EXHIBIT

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Under provisions of Section 309 of the act, the "extraordinary circumstance" faced by Chameleon must be acknowledged, but in its September 8th letter, Chameleon's situation was completely ignored as were the needs of the international communities it serves.

The cancellation of Chameleon's STA was subjective, arbitrary, and capricious for several reasons. First, dozens of STA applications were granted in recent years to broadcasters who constructed new transmitter sites closer to cities much larger than their city of license. However, this occurred when May Bradfield was in the position of determining which STA requests were granted. Policies regarding STA's changed dramatically when Ms. Bradfield was moved to another branch within the Commission and Mr. John Vu assumed Ms. Bradfield's responsibilities. Mr. Vu refused to authorize new tower construction even though he could not logically defend his position in the matter. It is clear, however, that a different bureaucrat produced different and quite arbitrary "rules."

The September 8th letter further states, "it is not our (the Commission's) policy to authorize new construction intended to be for permanent operations pursuant to STA. Again, we cite the common practice of allowing new antenna construction under Ms. Bradfield's guidelines and the contrasting prohibition now. As stated in the September 8th letter, this policy flies in the face of common sense. Instead, the policy should directly encourage such construction as long as the site is intended to be made the permanently licensed site. Only from such a site, or one licensed within three kilometers of it, can field strength readings be taken which are essential to establishing true ground conductivity from a new site thus allowing for the most efficient use of the spectrum.

Such construction also conserves the resources of the licensee since antenna construction can be made part of a permanent license later, thus saving additional construction expense, not to mention land acquisition, potential zoning problems, environmental damage, etc.

In addition to ignoring the needs of Houston's international community as well as Chameleon's extraordinary circumstances, Commission staff appears to imply in its September 8th letter that something was morally wrong Chameleon's STA operation. This is obvious from the last sentence in paragraph one of page five of the September 8th letter wherein the Commission dismisses the obligations and responsibilities of Chameleon to its programmers and instead complains that such a move deprives Bay City of a "licensed service it has *enjoyed* (emphasis added) for more than forty years." This advocacy of the old Bay City site is curious and remarkable in light of the fact that KFCC (formerly KIOX) had spent most of the last several years in a simulcast operation with its sister FM station and was considered "nothing but a liability" by its previous licensee and except for one weekend programmer was providing no local service to its city of license.

Cancellation of the STA at this point would destroy not only Chameleon's business enterprise, but also more than thirty other business entities; the programmers on KFCC.

Since commencement of operations from its STA site, KFCC has provided a service to communities that heretofore were completely unserved in one of the nation's largest metropolitan areas. All programmers on the station (Greek, Russian, Pakistani, Indian, etc.) support their programming efforts through the sale of commercial time and supply daily news, religious, and entertainment events to their respective communities. A blind cancellation of the STA fewer than 30 days prior to the cutoff date of Chameleon's currently pending 301 is completely illogical. It will destroy every one of these businesses.

Cancellation of the STA makes no sense from a technical standpoint either. The 300 watt STA operation of KFCC reduces rather than increases overlap to KWHI at Brenham, Texas. While a very minor amount of new overlap is created by the STA of KFCC, it is more than offset by the nearly 50% reduction in previously licensed overlap in other areas. In fact, as presently constituted, KFCC's STA complies with the spirit of MM Docket 87-267 in that first channel overlap which has been in place for more than 30 years is reduced by the nearly 50% as indicated above.

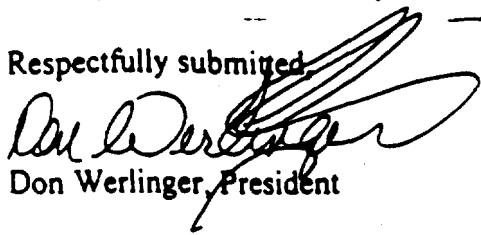
Cancellation of the STA also greatly jeopardizes the possibility that Chameleon would be able to construct permanent facilities sought in its currently pending application (BP-950804AC) which will eliminate virtually all the previously licensed overlap between the two stations.

In conclusion, KFCC's STA operation provides a needed service previously unavailable anywhere in southeast Texas. It is not merely another music or talk outlet but a unique vehicle for discriminating information to hundreds of thousands of legal immigrants from five different continents, and this is occurring on a radio station that previously had provided virtually no local service to its community.

Chameleon has shown good faith in proposing to make its site permanent and stands ready to construct the new facilities immediately upon approval of the Construction Permit sought in application BP-950804AC. The acceptance for filing and placement of the application on an October 6, 1995 cutoff clearly indicates the proposed facilities of KFCC meet the Commission's requirements and standards. Cancellation of the STA at this time, only weeks before cutoff is illogical, and counterproductive. It threatens the survival of Chameleon and its many programmers. Finally, the overall overlap situation with KWHI at Brenham, Texas is in fact, improved by KFCC's STA operation.

In light of the above, Chameleon respectfully requests the Commission's forbearance and reconsideration of its September 8th letter pending approval of its form 301 request to make the site permanent.

Respectfully submitted,



Don Werlinger, President

cc: Honorable Ken Bentsen  
U.S. House of Representatives

Honorable John Bryant  
U.S. House of Representatives

Honorable Gene Green  
U.S. House of Representatives

Honorable Ralph Hall  
U.S. House of Representatives

Honorable Greg Laughlin  
U.S. House of Representatives

Honorable Sheila Jackson-Lee  
U.S. House of Representatives

Honorable Charlie Wilson  
U.S. House of Representatives

KFCC Public Inspection File

**STATEMENT OF DON WERLINGER**  
**UNDER 28 U.S.C. Section 1746**

I, Don Werlinger am over the age of eighteen, of sound mind and do state upon my oath as follows.

1. I am the President of Chameleon Radio Corporation, licensee of AM Radio station KFCC (formerly KIOX AM), Bay City TX.
2. On or about January 5, 1995, I entered into negotiations with Landrum Enterprises, Inc., licensee of KIOX AM & FM to purchase KIOX-AM. Landrum wanted to sell the AM station but still wished to retain use of the transmitter sit for its own FM operation. As part of the necessary terms of the sale Chamelion, therefore, agreed to purchase the assets of the AM station including the assumptin of the land lease used for the transmitter site but, simultaneously, to lease the transmitter site back to Landrum Enterprises.
3. Chameleon, therefore, did not have use of the transmitter site. In addition, I intended, in any event, to apply for a permanent change of my city of license. For these reasons, I applied for a Special Temporary Authorization (STA) which was granted by the FCC. The opportunity to use the original transmitter site was not afforded Chameleon.
4. Part of Chameleon's application for the STA states that it had lost its transmitter site. That statement was true and there was no intention on my part to evade or misrepresent any facts to the FCC. The site loss was involuntary.
5. Chameleon Radio has developed its program format to serve the various ethnic minorities in the southeastern part of Texas. The groups with programming on the station (through time brokerage arrangements with various ethnic programming sources) include Greek, Indian, Pakistani, Nigerian, Philippine, Iranian, Argentinean, Russian, Vietnamese, Peruvian, Cuban, Hindu, Islamic, Rumanian, and Sri Lanka.
6. KFCC provides an important public service in that it is the only radio outlet to serve these ethnic and foreign language listeners in the south-eastern part of Texas.



**AFFIDAVIT OF DON WERLINGER**

October 5, 1995

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7. On August 4, 1995, Chameleon tendered an application before the Federal Communications Commission seeking to make the STA site in Harris County the permanently licensed KFCC site. That application was subsequently given a favorable preliminary review and accepted for filing by the Commission's staff. The application was given a public notice cutoff date of October 6, 1995.
8. Approximately ninety percent of the ethnic listeners served by KFCC at its present location will no longer be able to receive a usable signal should KFCC return to its Bay City location. The remaining ten percent of its present business would not be sufficient for Chameleon to remain on the air and it would be financially ruined.
9. Objections to Chameleon's STA application were filed with the FCC by Salem Radio and by KWHI. Salem Radio has since withdrawn all of its objections. Although KWHI has not formally withdrawn its objection, it has given me verbal assurances it will not oppose Chameleon's application for permanent change of city of license—a change that would produce signal propagation similar to that produced by operations under the present STA while affording additional protection to KWHI. Additionally, irrespective of the KWHI complaint regarding the KFCC STA site, the 300 watt operation of KFCC dramatically reduces previously licensed overlap between the two radio stations.
10. The original power authorized under the STA was 1,000 watts day and 100 watts at night. At that power, a usable signal was available to all of the listeners in Bay City, KFCC's city of license.
11. Because of the objections from Salem Broadcasting and KWHI, the FCC ordered a reduction of power to 300 watts daytime and 50 watts at night.

**AFFIDAVIT OF DON WERLINGER**

October 5, 1995

Page 3

12. Chameleon complied with the ordered power reduction but because of the lower power, the signal over Bay City became, as a practical matter, unusable.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

October 5, 1995

  
Don Werlinger, President  
Chameleon Radio Corporation

## **AFFIDAVIT OF PAUL KHAMBHATI**

My name is Paul Khambhati. I produce and host the program "*Voice of Sanatan Hinduism*" which is heard Saturdays from 8:00 am till 10:00 am KFCC. My is the only program which produces music, news, and information of specific interest to the Hindu community in Houston. Prior to my program, the Hindu community had no broadcast outlet and the loss of programming on KFCC would mean the loss of the only radio station in Houston which provides an opportunity for the decimation of essential information to a significant minority community.

From its Harris County site, KFCC provides a needed public service. Without it, the Hindu community in Houston would be placed in an unnecessary hardship situation. Although there a number of outlets for Christian programming in the market, no other broadcast outlet in Houston provides a similar opportunity to other religious faiths.

Even a temporary loss of the services provided by KFCC would be devastating to not only the "*Voice of Sanatan Hinduism*," but to more than two dozen other programmers on the radio station as well.



Paul Khambhati

Date: 10/5/1995

## AFFIDAVIT OF ALEX MEJIA

My name is Alex Mejia. I produce and co-host the program "*Radio Cafe*" which is heard weekdays from 1:00 pm till 3:00 pm KFCC. My program produces music, news, and information for Spanish speaking persons in Houston whose homelands are in central and south America. The type of Spanish language programming produced on "*Radio Cafe*" can only be heard on KFCC. All other Spanish language stations in the market target Mexican and Mexican-Americans; therefore, the central and south American communities from Peru, Chile, Argentina, Brazil, and others served by "*Radio Cafe*" would suffer the loss of their only mass media outlet if KFCC is no longer allowed to broadcast from its Harris County transmitter site.

If KFCC is no longer allowed to broadcast, my business would suffer irreparable damage as "*Radio Cafe*" would be unable to serve its listeners not only through the advertising of businesses which provide goods and services to those listeners, but also through the loss of community news and events which are also promoted by the program. I know of no other broadcast outlet in the Houston market which would provide a similar opportunity to broadcast programming like that of "*Radio Cafe*" other than KFCC.

The public interest is served by KFCC. The loss of KFCC, even a temporary one, would cause an extreme hardship to listeners of the "*Radio Cafe*" and would deprive those listeners of essential news and information found no where else in the marketplace.

  
\_\_\_\_\_  
Alex Mejia

  
\_\_\_\_\_  
Notary Public, Harris County, Texas

Date: 10/5/95



## AFFIDAVIT OF JOLENE MCMASTER

My name is Jolene McMaster. I co-produce the program "*In Touch With The World*" which is heard weekdays from 10:00 am till 11:00 am KFCC. "*In Touch With The World*" produces interview programs which have discussed topics ranging from crime and violence with an assistant Houston police chief to judicial reform and abortion and gay rights debates. This program; therefore, provides a daily public service to the community which would be lost should KFCC no longer be allowed to broadcast under its Special Temporary Authority.

Such a loss of KFCC's right to broadcast would cause extreme financial hardship to "*In Touch With The World*." Loss of its opportunity to broadcast would result in an inability for us to serve our advertisers and would eventually result in the demise of our business.

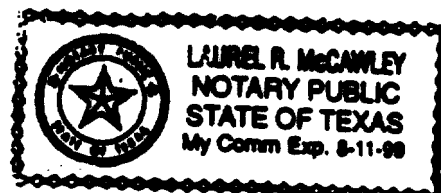
With its variety of programming and international language presentations, KFCC provides a program outlet found no where else in the Houston market. This is totally unique programming service, the loss of which would deprive Houston of a station operating in the public interest.

  
Jolene McMaster

Date: 10/5/95

  
Notary Public, Harris County, Texas

8-11-99  
Commission Expiration Date:



Chameleon Radio Corporation  
10865 Rockley Road  
Houston, Texas 77099  
(713) 564-1070 fax: (713) 564-8653

April 21, 1995

Office of the Secretary  
Federal Communications Commission  
P.O. Box 358165  
Pittsburgh, PA 15251 - 5165

Re: Request for Special Temporary Authorization for KIOX AM at Bay City, Texas

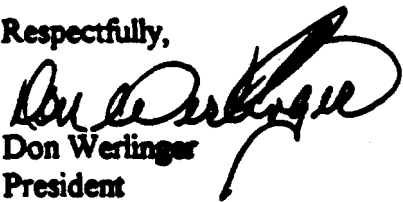
Dear Sir/Madam:

Transmitted herewith please find an original and two copies of a request for Special Temporary Authorization (STA) to relocate the transmitter site of AM station KIOX (call sign change to KFCC applied for) at Bay City, Texas.

FCC form 155 along with the required filing fee of \$115.00 are also enclosed.

If there are any questions regarding this request, please direct them to the address and telephone numbers above.

Respectfully,

  
Don Werlinger  
President

cc: KIOX public inspection file

EXHIBIT

10

# Before the Federal Communications Commission

Washington, D. C. 20554

## Request To Relocate Transmitter Site of KIOX AM At Bay City, Texas Under Special Temporary Authority

### Engineering Statement

KIOX AM (1270 kHz, 1 kw, U, DA-N) currently operates from a licensed site near Bay City, Texas (N 29 - 38 - 10, W 95 - 32 - 22). Due to the loss of its currently licensed site, Chameleon Radio Corporation ("Chameleon") licensee of KIOX (Note: New Call Sign - KFCC applied for as of April 21, 1995), respectfully requests authority to operate from an alternate site utilizing Special Temporary Authorization (STA).

### Proposed STA Site

KIOX proposes to utilize a site located 0.28 km (0.175 miles) east, southeast of intersection of Riceville Road and Cravens Road in rural southwest Harris County on a bearing of 100° True from that intersection. The geographic co-ordinates of the proposed site are: N 29 - 38 - 10, W 95 - 32 - 22. The site is outside the corporate limits of any city. ( See Exhibit: E - 1 )

### Proposed Antenna System

KIOX proposes to utilize a 54.86 meter (180 ft ) tower (representing 83.65% in electrical height) supporting a folded unipole antenna system. The tower will be bonded to the support tower at the 50 ohm point. Applicant proposes to utilize a mesh ground screen around the base of the support tower to a distance of 7.31 meters (24 ft ). Bonded to the mesh screen will be 120 radials comprised of #12 soft drawn copper wire extending to a distance of 59.13 meters (194 feet), except radials will be truncated where they intersect property line. No radial shall be shorter than 45.72 meters (150 feet) in length (including mesh). (See Exhibits: E - 2, Page 1, and E - 2, Page 2)

### Allocation

As herein proposed, KIOX seeks authority to operate with 1,000 watts non-directional daytime and 250 watts non-directional from the proposed STA site. The proposed STA operation will produce no prohibited overlap with the exception of overlap to KWHI (1280 kHz, 1 kw, ND-D) at Brenham, Texas.

With regard to overlap both produced and received from KWHI, field strength readings on the currently licensed non-directional operation of KIOX are submitted along radials bearing 10, 30, 310, 330, and 350 degrees true. Accurately plotted, the resulting contours show a wide area of overlap between the currently licensed KIOX site and KWHI. Utilizing Figure M-3 to determine contours, there will be .5 mV/m overlap between KIOX and KWHI from the proposed STA site; however, the overlap created from the proposed STA site will reduce overlap to KWHI by more than 35% as compared to the overlap produced by the currently licensed KIOX site. (See Exhibit: E-5, Pages: 1 thru 4)

### Readings To Be Taken

Chameleon intends to make the proposed STA site its permanent transmitter location. An application seeking to make the proposed STA site the permanently licensed site is currently being prepared; however, field strength readings from the proposed STA site are necessary to complete that form 301 application; therefore, the application cannot be presented prior to grant of the instant STA request. Once the STA operation is on the air, Chameleon will immediately commence necessary field strength readings along pertinent radials and the formal form 301 request to make the STA site the station's permanent transmitter location.

### FAA Authority

Although the proposed 180 foot tower is below minimums necessary to seek FAA authority to construct, Chameleon has presented an FAA form 7460-1 to the FAA Southwest Regional office in Ft. Worth, Texas on April 20, 1995. FAA approval of the form is expected prior to May 1, 1995. (See Exhibit: E - 6).

If any questions occur regarding the instant request, please contact:

Don Werlinger, President  
Chameleon Radio Corporation  
10865 Rockley Road  
Houston, Texas 77099

(713) 564 - 1070  
(713) 564 - 8653 (Fax)

Respectfully Submitted,

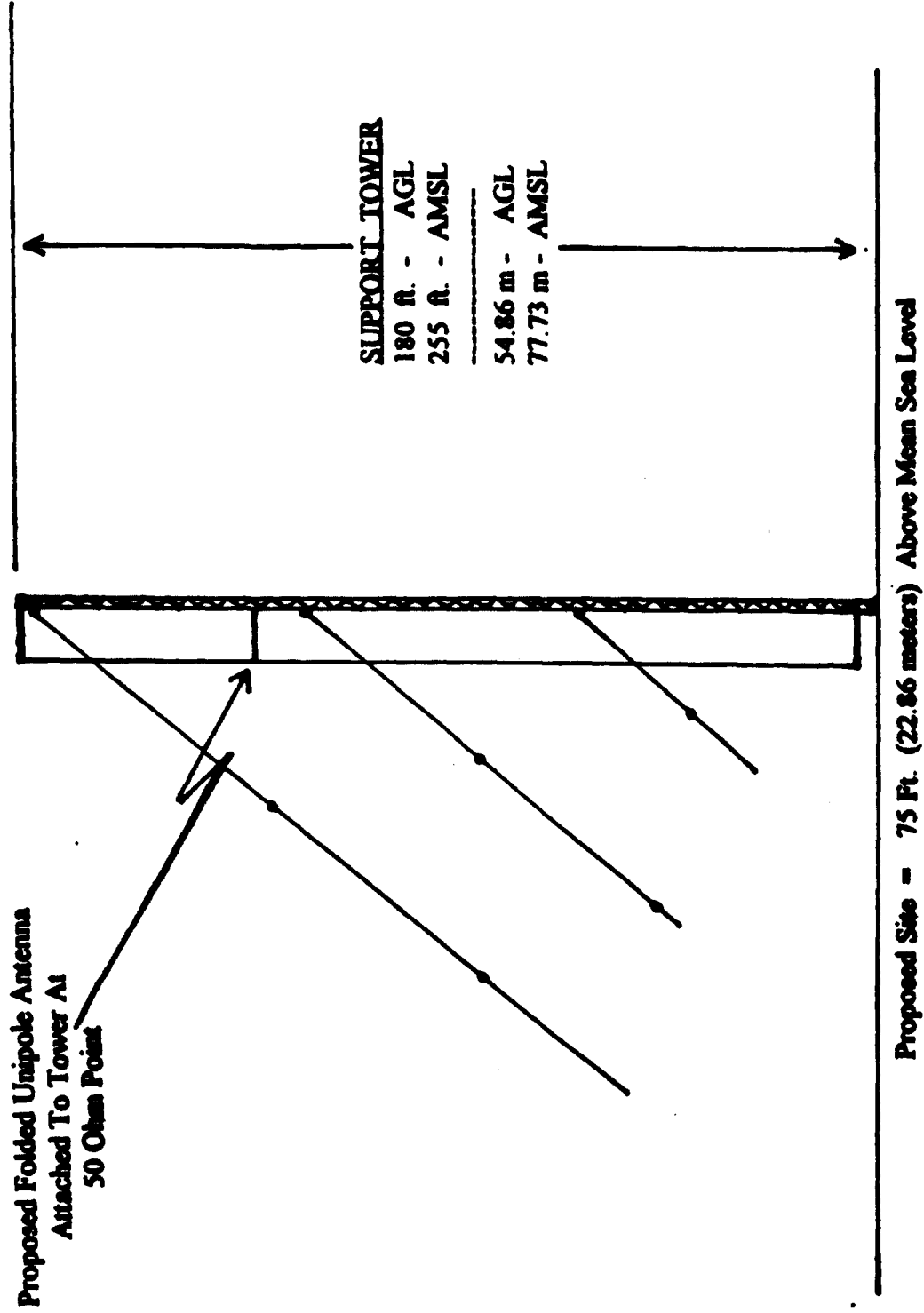


Don Werlinger, President  
Chameleon Radio Corporation

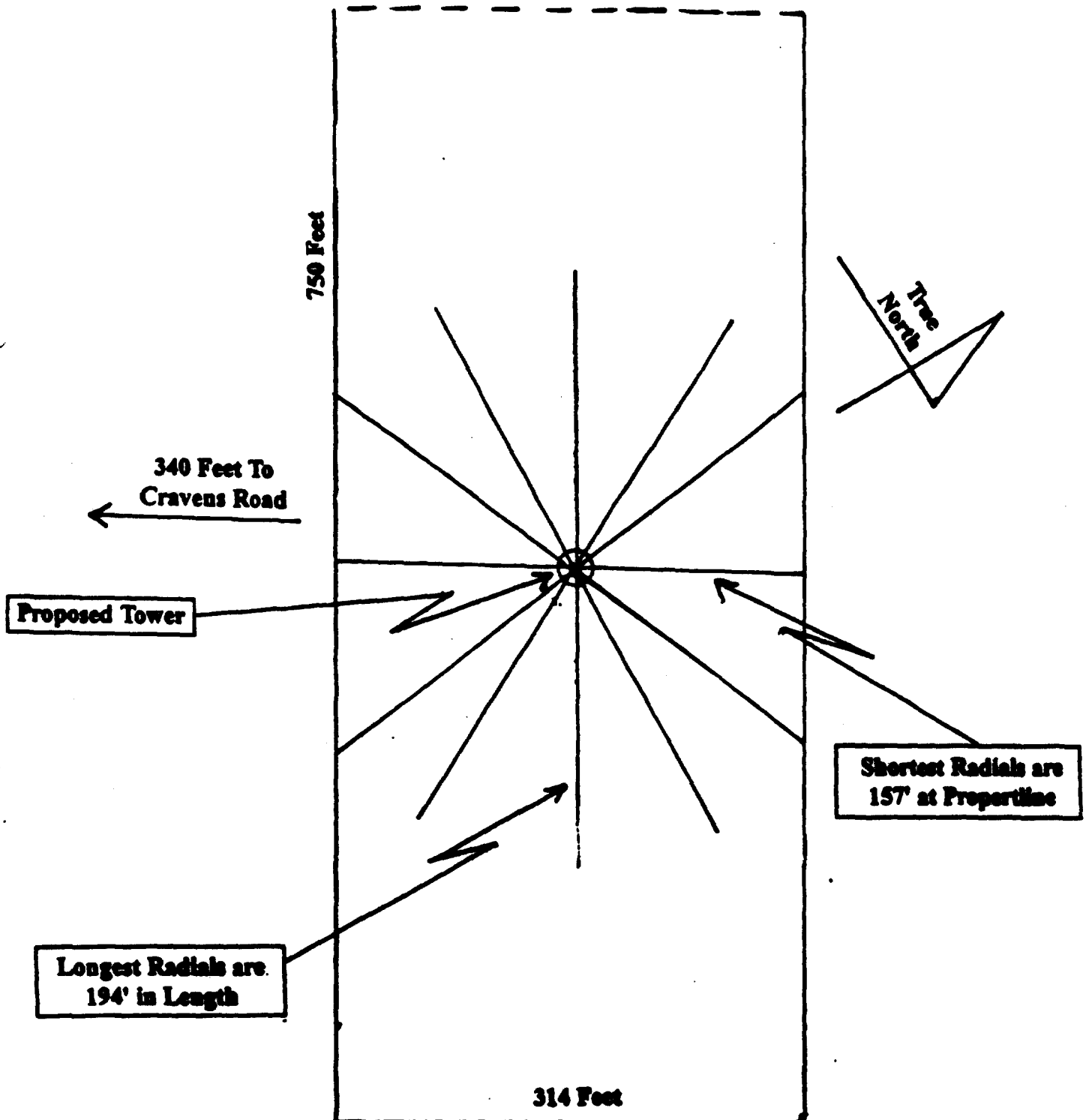
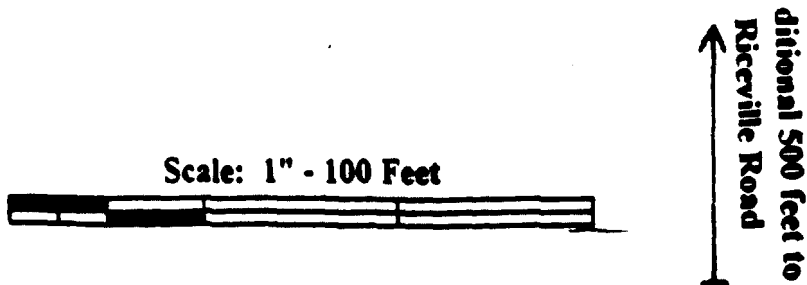




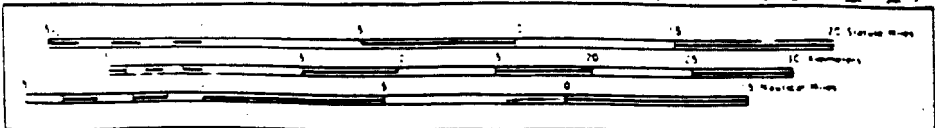
# VERTICAL PLANSKETCH



Chameleon Radio Corporation  
 Licensee, Radio Station KIOX  
 Bay City, Texas  
 1270 kHz, 1 kw, U, DA-N  
 Exhibit: E - 2, Page: 1



Chameleon Radio Corporation  
Licensee, Radio Station KIOX  
Bay City, Texas  
1270 kHz, 1 kw, U, DA-N  
Exhibit: E - 2, Page: 2



Chameleon Radio Corporation  
Licensee, Radio Station KIOX  
Bay City, Texas  
1270 kHz, 1 kw, U. DA-N  
Exhibit: E-3, Page: 1

Portion of USGS 1:250,000 Series  
Map Entitled "Houston, Tex"

Proposed STA  
50 mV/m Contour

Proposed  
STA Site

HOUSTON

N 29 - 45 - 00

N 29 - 30 - 00

CHAMELEON RADIO CORPORATION, LICENSEE  
RADIO STATION KIOX, BAY CITY, TEXAS  
1270 kHz, 1 KW, U, DA-N

EXHIBIT: E - 4, PAGE: 1

**TABULATION OF FIELD INTENSITY MEASUREMENTS**

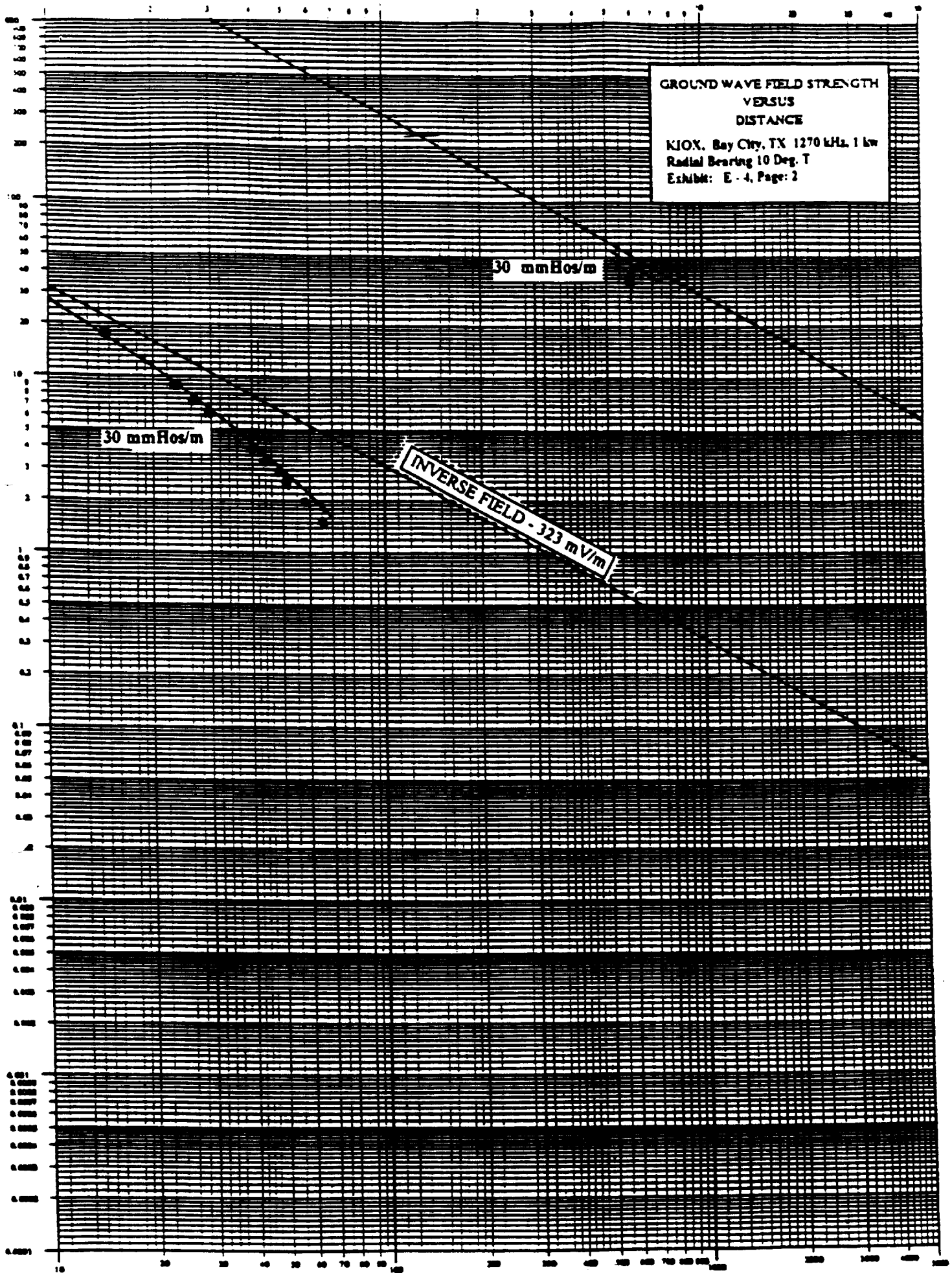
**KIOX - BAY CITY, TEXAS**  
**1270 kHz, U, DA-N**

**Radial B 10.0 Degrees True**

<u>Point</u>	<u>Kilometers</u>	<u>Time</u>	<u>Reading in mV/m</u>
1	6.00	1512	37.50
2	14.50	1502	17.50
3	23.20	1450	8.80
4	26.10	1435	7.20
5	29.00	1421	6.40
6	40.80	1413	4.00
7	45.50	1402	3.50
8	49.30	1348	2.90
9	53.00	1336	2.40
10	59.30	1320	1.90
11	65.10	1312	1.50

GROUND WAVE FIELD STRENGTH  
VERSUS  
DISTANCE

KIOX, Bay City, TX 1270 kHz, 1 kw  
Radial Bearing 10 Deg. T  
Exhibit: E - 4, Page: 2



**CHAMELEON RADIO CORPORATION, LICENSEE  
RADIO STATION KIOX, BAY CITY, TEXAS  
1270 kHz, 1 KW, U, DA-N**

**EXHIBIT: E - 4, PAGE: 3**

**TABULATION OF FIELD INTENSITY MEASUREMENTS**

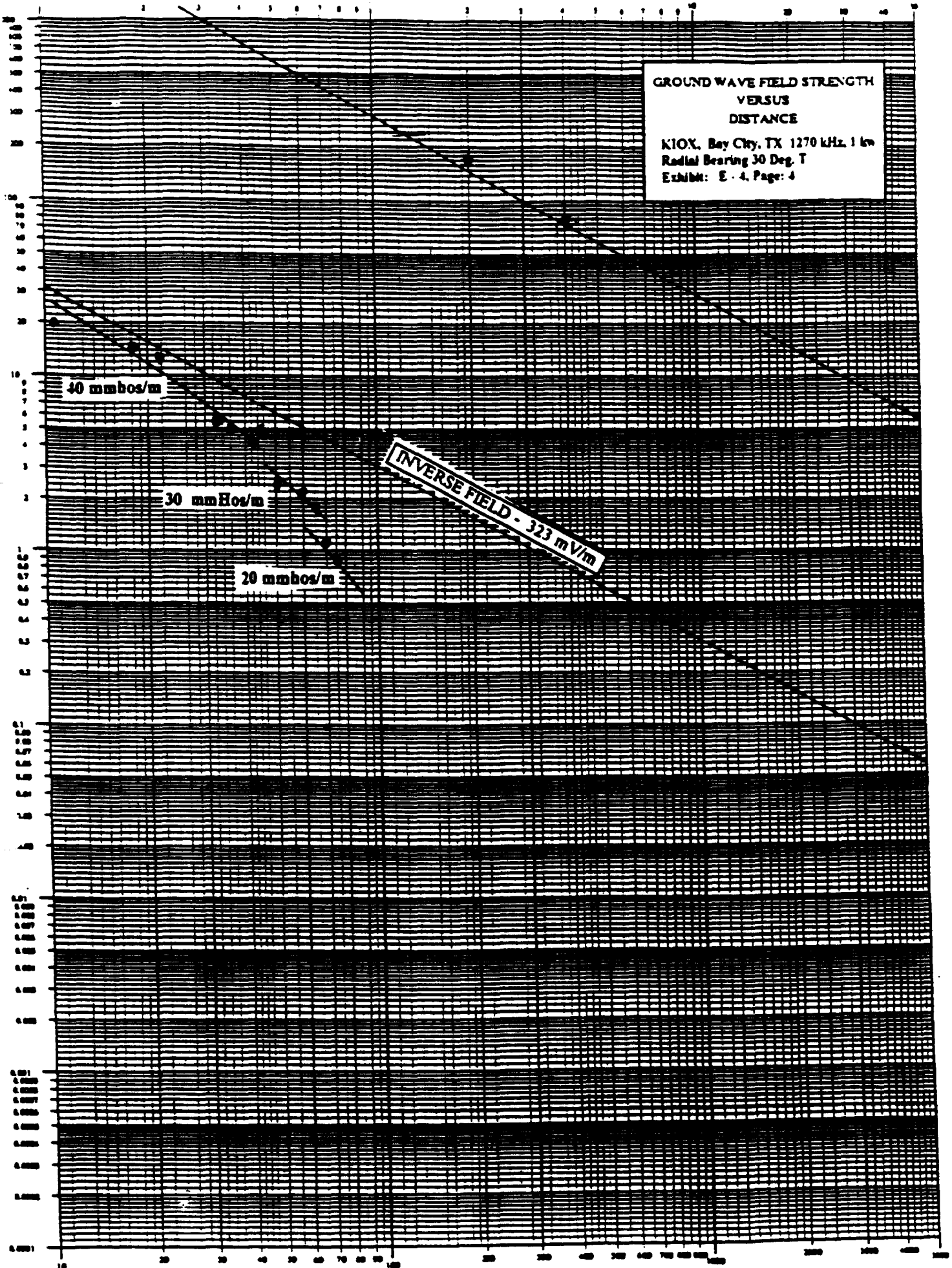
**KIOX - BAY CITY, TEXAS  
1270 kHz, 1 KW, U, DA-N**

**Radial Bearing 30.0 Degrees True**

<u>Point</u>	<u>Kilometers</u>	<u>Time</u>	<u>Reading in mV/m</u>
1	2.20	1018	171.00
2	4.10	1032	77.00
3	8.00	1045	43.00
4	10.90	1054	20.00
5	18.80	1104	14.20
6	22.00	1115	11.80
7	33.30	1125	5.50
8	36.00	1140	5.10
9	43.00	1152	4.20
10	45.80	1159	4.80
11	50.10	1210	2.50
12	58.00	1225	2.10
13	64.30	1234	1.80
14	70.50	1248	1.00
15	76.00	1257	0.85

GROUND WAVE FIELD STRENGTH  
VERSUS  
DISTANCE

KIOX, Bay City, TX 1270 kHz, 1 kw  
Radial Bearing 30 Deg. T  
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CHAMELEON RADIO CORPORATION, LICENSEE  
RADIO STATION KIOX, BAY CITY, TEXAS  
1270 kHz, 1 KW, U, -DA-N

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TABULATION OF FIELD INTENSITY MEASUREMENTS

KIOX - BAY CITY, TEXAS  
1270 kHz, 1 KW, U, DA-N

Radial Bearing 310.0 Degrees True

Point	Kilometers	Time	Reading in mV/m
1	3.00	0851	
2	7.10	0857	58.00
3	8.20	0907	32.00
4	24.20	0933	9.80
5	33.00	0946	6.30
6	37.70	0958	5.90
7	41.00	1011	7.50
8	44.50	1017	4.90
9	50.50	1026	4.40
10	56.20	1035	3.80
11	62.00	1057	3.00
12	68.30	1109	2.50
13	76.10	1120	2.30
14	83.20	1150	1.70
15	88.50	1204	1.30
16	93.00	1217	1.40